

Esteemed Commissioners,

I invite you to question, the implementation of Wireless Internet Service Providers (WISP) using part 15 to provide connectivity to there users. These WISPs will be using the same unlicensed shared bandwidth technologies as all current 802.11 users

The problem is that if the new sectorized and phased array antennas are used. The new antennas are capable of connecting multiple clients simultaneously using different channels, that individuals that all ready have wireless local area networks in there houses will be adversely affected. These new antennas will also use higher gain then normal antennas because of new point to multipoint rules. The WISPs will then use there antennas to populate all of the usable frequencies in the shared spectrum. Once they occupy most of the channels, which in 802.11b there are only three nonoverlappable channels 1, 6, 11.

Upon proper installation of a wireless network, a necessary site survey should be completed before selecting the proper channel to use. Selecting a channel that was in visible use during the site survey is not a good idea. Being on the same frequency will cause errors and because of the inherent technology, you will have to weight until the channel is clear to transmit. This causes increased weight and lag time. When one has other wireless networks in proximity your wireless card will try to pick up the strongest signals, if the WISPs are able to broadcast in nearly all the frequency's at a stronger level then others then interference is going to have to be expected.

I believe once these WISPs start operating with FCC part 15 devices. Other part 15 users, because of the extra gain and saturation on the bandwidth, will adversely affect their devices. Upon this, I believe that they will be back to the FCC complaining that they need special protection from interference. By using part, 15 devices one have to except interference but cannot create interference to a licensed frequency user. There argument will be that in order to keep in business they will need protection. Once businesses make money it is in the governments' best interests to keep them in existence. This has been the general practice the last decades. This creates jobs and revenue. Depending upon how big the WISP industry gets it will be harder not to appease them. The only way to keep them around is going to be at the artifice of other part 15 users.

The FCC should anticipate what would happen once these Wireless Internet Service Providers have there market fully frequency saturated. Allowing these providers to use special antennas to utilize all the frequencies in not in the best interest of part 15 users. WISPs should not be permitted to use part 15 to provide internet access, but instead use FCC licensed equipment and lease the licensed frequency for a period no more then two years at a time, so as not to occupy frequency longer then needed.